

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re: ) Chapter 9  
)  
) Case No. 13-53846  
CITY OF DETROIT, MICHIGAN, )  
) Hon. Steven W. Rhodes  
)  
Debtor. )

FILED  
2014 SEP 16 P 4:57  
U.S. BANKRUPTCY COURT  
E.D. MICHIGAN  
DETROIT

**EX PARTE MOTION OF EDWARD GEORGE CARTER FOR LEAVE TO FILE  
RESPONSE TO DEBTOR'S FIFTH OMNIBUS OBJECTION TO CERTAIN  
CLAIMS IN THE TRADITIONAL MANNER**

Now comes EDWARD GEORGE CARTER, by and through his undersigned counsel, and for his *Ex Parte* Motion for Leave to File Response to the Debtors' Fifth Omnibus Objection to Certain Claims in the Traditional Manner respectfully states as follows:

1. Edward Carter filed a Proof of Claim in this action, which has been designated Claim Number 3509.
2. Debtor filed its Fifth Omnibus Objection to Certain Claims (Docket #7197) ("Objection") on August 29, 2014, and included Mr. Carter's claim on its list of claims it seeks to have disallowed.
3. Counsel for Mr. Carter understands that represented parties are to electronically file a response to the Debtor's Objection; however, undersigned counsel for Mr. Carter does not have an ECF login and/or password for the United States Bankruptcy Court for the Eastern District of Michigan.

4. According to the Court's website, the next registration class for ECF filing for creditor attorneys is October 9, 2014.

5. Mr. Carter opposes the disallowance of his claim, and his Response to the Debtors' Objection to his claim must be filed by September 24, 2014.

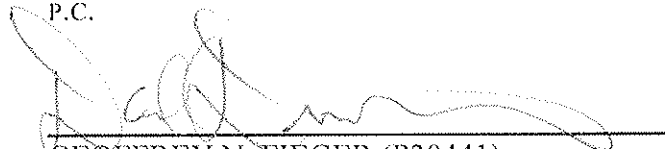
6. Therefore, Mr. Carter respectfully requests that this Court grant him permission to file his response to the Debtor's Objection to his claim in the traditional manner.

7. Mr. Carter is filing said Response contemporaneously with this Motion, and a Proposed Order.

WHEREFORE, EDWARD GEORGE CARTER respectfully requests that the Court GRANT his Motion for Leave to File Response to Debtor's Objection in the Traditional Manner.

Respectfully submitted,

FIEGER, FIEGER, KENNEY, GIROUX & HARRINGTON,  
P.C.



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September 16, 2014

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**PROOF OF SERVICE**

On September 16, 2014, I ROBERT MILLS, personally served, a copy of the *Ex Parte Motion of Edward George Carter for Leave to File Response to Debtor's Fifth Omnibus Objection to Certain Claims in the Traditional Manner* and this *Proof of Service* upon:

John A. Simon  
Tamar N. Dolcourt  
Foley & Lardner LLP  
500 Woodward Ave., Ste. 2700  
Detroit, MI 48226

and declare under penalty of perjury that this statement is true to the best of my knowledge, information and belief.

  
ROBERT MILLS

FILED  
2014 SEP 16 1 P 2:32  
CLERK OF COURT  
E.D. MICHIGAN DETROIT